

Between on or about January 1, 2022, and on or about January 31, 2022, in the Eastern District of Missouri, and elsewhere, the defendant,

ROBERT MERKLE,

knowingly transmitted in interstate or foreign commerce a communication containing a threat to injure a person, "M.O."

In violation of Title 18 United States Code 875(c)

COUNT THREE

The Grand Jury further charges that:

Between on or about October 1, 2021, and October 31, 2021, in the Eastern District of Missouri, and elsewhere, defendant,

ROBERT MERKLE,

with the intent to harass and intimidate another person, C.E., used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to that person, C.E.

In violation of Title 18 USC 2261A(2)(B).

COUNT FOUR

The Grand Jury further charges that:

Between on or about June 1, 2021, and January 31, 2022, in the Eastern District of Missouri, and elsewhere, defendant,

ROBERT MERKLE,

with the intent to harass and intimidate another person, L.S., used any interactive computer service and electronic communication service and electronic communication system of interstate

commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to that person, L.S.

In violation of Title 18 USC 2261A(2)(B).

COUNT FIVE

The Grand Jury further charges that:

Between on or about January 1, 2022, and January 31, 2022, in the Eastern District of Missouri, and elsewhere, defendant,

ROBERT MERKLE,

with the intent to harass and intimidate another person, J.A., used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to that person, J.A.

In violation of Title 18 USC 2261A(2)(B).

A TRUE BILL.

FOREPERSON

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